

POOR QUALITY ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED
MAY 20 2025

CLERK'S OFFICE
DETROIT

DERRICK LEE CARDELLO-SMITH, #267009
Plaintiff,

Vs

SEAN COMBS,
Defendant,

Case No 5:24-cv-12647
Honorable Judith E. Levy

**PLAINTIFF'S MOTION FOR SANCTIONS TO BE ENTERED
AGAINST RESPONDENTS FOR ALTERING THE PETITIONERS
TRUE DOCUMENTS AND REPLACING THEM WITH FORGERIES
IN THE INTEREST OF DESTROYING PLAINTIFF'S CREDIBILITY,
TO ENSURE PLAINTIFF DOES NOT GET THE RIGHTFUL CLAIM FOR
THE PERSONAL INKURY AGAINST PLAINTIFF AND TO ENSURE
COLLECT ON THE RIGHTFUL CLAIM OF 49 % OF THE ENTIRE
BAD BOY ENTERTAINMENT PLAINTIFF IS OWED FROM 1997 to 2025**

Plaintiff, Derrick Lee Cardello-Smith, hereby moves this Court to enter an order to GRANT SANCTION are entered against the Defendants for Altering teh Petitioners Original Documents and then replacing them with forgeries and in order to destroy the Petitioners Credibility, to prevent the Plaintiff release from unlawful custody and, to ensure that the petitioner does not collect on the 49% rightful claim that this Plaintiff has to Bad Boy Entertainment.

In Support of this Motion for Sanctions, the Plaintiff states the following:

1. Plaintiff has been provided proof from the Michigan Department of Corrections in the form of a Grievance that confirms that the Defendants working in tandem with each other, have all worked to replace the Petitioners Original Documents with Forged documents and then altered them in order to destroy this Petitioners Credibility.

2. the Evidence shows that this Plaintiff has in fact been part of a concentrated effort by the respondents and their attorneys throughout the entire phase of these proceedings and others to ensure that the original documents placed in the hands of the Michigan Department of Corrections Employees for Mailing to the Court, were replaced with false documents, and it has continued throughout this day.

3. Plaintiff provides the following examples:

a. Defendants used a False Financial Statement and called it BAD BOY RECORDS and then substituted the Petitioners Original Financial Agreement of BAD BOY ENTERTAINMENT, for the purpose of destroying this Petitioners Credibility.

b. Plaintiff is Submitting the TRUE FINANCIAL AGREEMENT with BAD BOY ENTERTAINMENT (Offer of Proof #1) as proof of this and asks this Court to Enter it on the record.

c. Plaintiff also is submitting irrefutable proof of the actions of the Defendants in the very beginning of the case where during a JOINT MEETING with 36th District Court Employee Denise Jackson, Plaintiff Cardello-Smith, and State of Michigan Approved Notary Public where

1.

POOR QUALITY ORIGINAL

The following was discussed:

Payment to 36th District Judge Laura Echarte to Authorize a Warrant for this Plaintiff on the criminal case involved in this matter, and it was also done by Defendant Combs Attorney Mark Agifilo, with other members involved back in 2019 (SEE ATTACHED 4 PAGE JOINT AFFIDAVIT.) Petitioners Offer of Proof #2..

I therefore ask for sanction to be entered against these respondents and further action taken to enjoin these respondents from committing any further acts against this Plaintiff, and that this court conduct a hearing on this request.

RELIEF SOUGHT

Wherefore, Plaintiff prays this Court will Enter Sanctions against the respondents in a form it deems just and necessary and appropriate.

Respectfully Yours,

May 15, 2025

A handwritten signature in black ink, appearing to read "Derrick Lee Cardello-Smith", written over a horizontal line.

Derrick Lee Cardello-Smith

#267009

Ionia Maximum Correctional Facility
1576 W. Bluewater Highway
Ionia, MI 48846

**OFFER OF PROOF #1
THE FALSE FINANCIAL STATEMENT SUBMITTED BY THE DEFENDANTS
IN PLAINTIFFS CASE AND THEN POSING IT OFF AS PLAINTIFFS**

OFFER OF PROOF #7
 THE False Document Submitted By Defense

Bad Boy Records Label and Company

Recording Studios and Company
 Brooklyn, New York, 10019-524

INVOICE

TO: Mr. Derrick Lee Cardello-Smith (Hospitality)
 19246 Hoyt
 Detroit, Michigan 48205

January 3, 1997 Transaction No. 97-1090108 Investment Business Service Detroit, Michigan

Purpose	Description	Investment	Total Amount
	<p>Personal Investment of Monetary total into the Bad Boy Records Label, Corporation, Holdings, Developments, Artists, Records, Shares, Stocks, Future Projects, Real Estate, Properties, Homes, Contracts, Agents, Production, Film, Music, Art, Any Future Holdings, Items, Singers, Words, All Savings, Holdings, Checking and Financial Conducted in the Name is Sean Combs, In the name of Sean John Combs, attached to, with or a part of any entity, company, partnership, trade, or Ventures that are conducted in any way in the Name of Sean Combs or Bad Boy Records of the Name, Likeness, Image of Bad Boy Records, to Start in the Year of JANUARY 1997 through the Terms of JANUARY 2007, JANUARY 2017 and JANUARY 2027 for 10, 20 and ending of the 30 YEARS TIME, with the Moneys received from Citizen and Private Investor and Waiter/Person of DERRICK LEE CARDELLO SMITH, of the City of Detroit and Employed at Fishbones in the City of Detroit, State of Michigan shall be allowed to WITHDRAW FROM THIS AGREEMENT AT 10 (TEN) - 20 (TWENTY) or 30 (THIRTY) YEARS TIME and Sean Combs Agrees to Refrain from Any further State or Federal Criminal Behaviors & Derrick Lee Cardello-Smith will be entitled to the total of 49% (Forty-Nine) Percent of all Holdings Gross, Net, worth of ALL BAD BOY RECORDS LABEL, INC., CORPORATION & HOLDINGS, and Release of Cardello-Smith from Bad Boy LLC</p>	\$150,000.00	\$150,000.00

Marcus Ashford

Notary Public State of Michigan

County of Wayne

My Commission Expires on 7/19/1998

Acting in the County of Wayne

Derrick Lee Cardello-Smith
 1-3-97

OFFER OF PROF #2

**TRUE FINANCIAL STATEMENT AND AGREEMENT SHOWING
TRUE INVESTMENT BY PLAINTIFF INTO BAD BOY ENTERTAINMENT
AND CLEARLY AUTHENTIC AND NOT FORGED**

offer of proof #2
THE True Document**Bad Boy Entertainment, Epic, Inc.**1710 Broadway, Fl2
New York, New York 10019-US**INVOICE****TO:** Derrick Lee Cardello-Smith (Hospitality)
19246 Hoyt
Detroit, Michigan 48205

January 3, 1997 Transaction No. 97-1090108 Investment Business Service Detroit, Michigan

Purpose	Description #5 of 10 Private Investors	Investment	Total Amount
TERMS Offset losses of Bad Boy Ent. due to the success of DEATH ROW RECORDS	Private investment of Monetary Funds from party above for as Investor #5 of 10 Private Investors named as the Holder DERRICK LEE CARDELLO-SMITH. Sean Combs, Owner and CO-founder of BAD BOY ENTERTAINMENT, privately and apart from the Entity of EPIC RECORDS and SONY RECORDS. The following terms are agreed: SEAN COMBS- Accepts Cardello-Smith's Investment of cash INTO BAD BOY ENTERTAINMENT in the amount of: \$150,000.00 (One-Hundred Fifty Thousand Dollars) As 5 of 10 Private Investors of the 10 individuals Cash investments of \$150,000.00 each for the full amount of 1,500,000.00 (1.5million dollars) for The rights to 49% of all future holdings, sales, recordings, contracts, properties, homes, titles, the Future recording artists, prospective artists, all of the FILM, MUSIC, APPAREL, BEVERAGES, & ALL BUSINESS AGREEMENTS, LABELS, LLC, And shares of BAD BOY ENTERTAINMENT, to be recouped and recovered by Investors or the #5 investor, DERRICK LEE CARDELLO-SMITH. Cardello-Smith's 1 provision is SEAN COMBS must refrain from any STATE or FEDERAL CHARGES and will not Pursue any Illegal Actions against Cardello-Smith- a violation of this Provision allows Cardello-Smith the 49% as a minority Shareholder and investor of BAD BOY ENTERTAINMENT in 2007, 2017, 2027 & RELEASE FROM BAD BOY ENTERTAINMENT AND TO recover funds used to save Bad Boy Entertainment	\$150,000.00	\$150,000.00

Terms:

Sub Total **\$150,000.00**
Tax **Unreported as loan**
Grand Total: **\$150,000.00**

Subscribed and Sworn before me on this
7th day of January 1997 in the City of
Detroit, Michigan, County of Wayne.

Sean Combs 01-03-97

SEAN COMBS
a/k/a/ Puff Daddy
Bad boy Entertainment and
Co-Founder

Derrick Lee Cardello-Smith 1-3-97
Derrick Lee Cardello-Smith
Investor
19246 Hoyt
Detroit, Michigan 48205

Marcus Ashford 3 1997
Notary Public

My commission expires on 1-15-2000

MARCUS ASHFORD
Notary Public, State of Michigan
County of Wayne
My commission Expires Janurt 15,2000
Acting in the County of Wayne

**OFFER OF PROOF #3
JOINT AFFIDAVIT OF DENISE JACKSON AND PLAINTIFF
CONFIRMING PAYMENT TO FALSELY ARREST AND CHARGE
TO HIDE CRIMES BY DEFENDANT UPON PLAINTIFF**

$$\left. \begin{array}{l} \text{---} \\ \text{---} \end{array} \right\} \text{ss}$$

ON ORDERS OF SEAN JOHN COMBS a/k/a/ P.DIDDY

STATEMENT OF DENISE JACKSON AS TO THE CASE OF PEOPLE OF THE STATE OF MICHIGAN
vs DERRICK LEE CARDELLO-SMITH Case No 2019-000756-01-FC Wayne County Circuit
Court:

- 1.**

John Combs and Bad Boy LLC, because Sean Combs did in fact take Money from Cardello-Smith in the Form of a Cash payment of \$150,000.00 (One-Hundred Fifty Thousand Dollars) while acting as a Bartender for Mr. Combs.

7. I accepted Money to Process the Warrant, The Complaint, the Rape Test Kit Results, and I was ordered to do these acts in my official capacity as case Manager for the Criminal Division of the 36th District Court in the Criminal Case of People of the State of Michigan v. Derrick Lee Cardello-Smith MDOc #267009.

8. I knowingly processed and participated in the false Criminal Charges against Mr. Cardello-Smith and I knew that these charges were false and I had no choice except to act on these proceedings because if I did not, Sean Combs, Kym Worthy and the Detroit Police Department would act on their previous threats and beatings I took and I did it out of fear for my families safety and my own.

9. Derrick Lee Cardello-Smith has been wrongfully charges, wrongfully convicted and has been maliciously prosecuted by these members of the same organization and I played a role in this Mans Innocence being taken and and his continued incarcerated is all because of my own acts in office.

10. I will attest to these events if and when called about the Bribes, and False Prosecutions that have taken place in this Court as well as the claims detailed in Woods v. 36Th District Court.

11. Derrick Lee Cardello-Smith is in prison because of my own acceptance of money that I was paid to process false charges, and documents against him and I ask that this Affidavit is accepted as real and true and in the presence of Derrick Lee Cardello-Smith #267009.

STATEMENT OF DERRICK LEE CARDELLO-SMITH #267009 AS TO MY WRONGFUL INCARCERATION AND CONVICTION ON THE ORDERS OF SEAN COMBS (DIDDY) AND OTHER NAMED PERSONS:

1. my name is Derrick Lee Cardello-Smith #267009.
2. I am in Prison on Orders of Sean Comb, and wrongfully convicted.
3. I have been Placed in Prison by and on the Orders of Sean Combs "Diddy" and Kym L. Worthy, Wayne County Prosecutor.
4. I did not Rape Anyone.
5. I was raped by Sean Combs.
6. I had money taken from me by Sean Combs.
7. I had my freedom taken by Sean Combs.
8. I should be allowed to withdraw my No-Contest Plea.

9. I only plead No Contest after my Witnesses Life was Threatened by Detective Patricia Penman and Sean Combs less than 2 weeks before it was scheduled to go to trial.

10. Detective Penman, Worthy and Sean Combs threatened my witness to not come forward.

11. I NEVER PLEAD GUILTY, I WAS NEVER FOUND GUILTY BY A JUDGE, I WAS NEVER FOUND GUILTY BY A JURY TRIAL.

12. I should be allowed to withdraw the Plea.

13. Sean Combs framed me and did so for the purpose of ensuring that I could not go through with collecting my investment and the returns of my investment into Bad Boy Records in January 1997.

14. I should not be held in prison and I should be allowed to withdraw the No Contest Plea and Proceed to a Jury Trial and these people should be allowed to come to court and offer REAL TESTIMONY TO THE TRUTH, and that is that I did not commit any crimes against anyone.

15. Judge Echarte was paid to Falsely Arraign me on Charges that she accepted money for and it was all done on the named parties behalf, to silence me and convict me and to keep me out of the way.

16. I will proceed to a Jury Trial if I am allowed to do so.

17. What does the Wayne County Prosecutors Office, Sean John Combs and everyone else have to worry about in court by allowing me to go to a Jury Trial? If they are so confident that I did this crime, then simply allow the No-Contest Plea to be withdrawn and allow me to Proceed to a jury Trial.

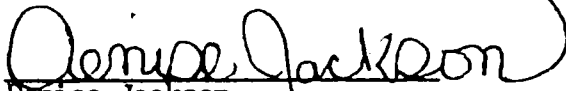
18. I am willing to do it, but they are scared of the fact that they know that they have conspired to frame me and convict me and keep me silenced for so many years and they know I know All the Dirt they have done over the years and they do not want it to get out, otherwise, why have they worded so hard to deny me my freedom and it has been wrong for so many decades to have me incarcerated for crimes I did not do and that were actually committed by Defendant Sean John Combs.

The events are true and accurate and real and are signed by both persons in attendance for Statement and Signing and will swear to these events under the Penalty of Perjury.

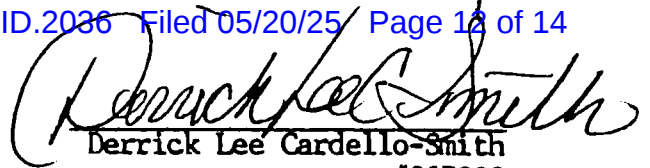
DECLARATIONS

The persons and parties do swear and declare that the above events are true, accurate and real and are based on personal experience, knowledge and belief and will be attested to under the penalty of perjury in a Court of Law.

The above person(s) did appear before me on the date of April 3, 2025 for the above affidavits detailed herein and sayeth nothing more.



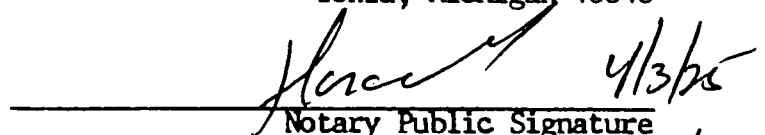
Denise Jackson
36th District Court
Criminal Division employee
421 Madison Street
Detroit, MI 48226



Derrick Lee Cardello-Smith
#267009
Ionia Bellamy Creek Correctional Facility
1727 West Bluewater Highway
Ionia, Michigan 48846

Dated: APRIL 3, 2025

My Commission does not expire.


Notary Public Signature
4/3/25
Exp 1/16/30

Derrick Lee Cardello-Smith
#267009
Ionia Maximum Correctional Facility
1576 W. Bluewater Highway
Ionia, MI 48846

May 15, 2025

Office of the Clerk
US District Court
231 W. Lafayette Blvd
Detroit, MI 48226

Re: Derrick Lee Cardello-Smith v. Macauley, Sean Combs, et al
Case No 5:24-cv-12647

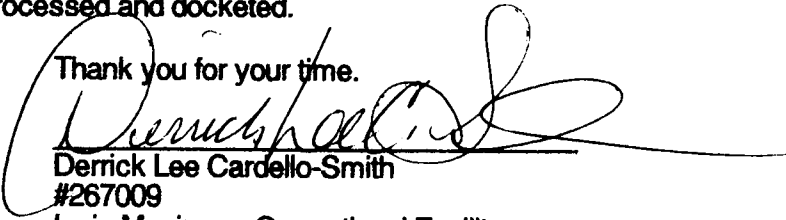
Dear Clerk:

Enclosed for filing in the above cause, find teh following documents:

1. MOTION FOR SANCTIONS TO BE ENTERED Against RESPONDENTS FOR ALTERING THE PETITIONERS TRUE DOCUMENTS WITH FORGERIES IN THE INTEREST OF DESTROYING PETITIONERS CREDIBILITY TO ENSURE PLAINTIFF DOES NOT GET THE RIGHTFUL CLAIM FOR THE PERSONAL INJURY AGAINST PLAINTIFF AND TO ENSURE PLAINTIFF DOES NOT COLLECT ON THE RIGHTFUL CLAIM OF 49% OF THE ENTIRE BAD BOY ENTERTAINMENT PLAINTIFF IS OWED FROM 1997 to 2025.
2. OFFER OF PROOF #1 THE DEFENDANTS FORGED DOCUMENTS.
3. PLAINTIFFS TRUE DOCUMENT OF FINANCIAL INVESTMENT.
4. JOINT AFFIDAVIT OF COURT EMPLOYEE AND PLAINTIFF COMPLETELY NOTARIZED CONFIRMING MONEY CHANGING HANDS TO CONVICT AND OBSTRUCT JUSTICE AGAINST PLAINTIFF.

Please place this matter on teh Courts docket and notify me when it has been processed and docketed.

Thank you for your time.


Derrick Lee Cardello-Smith
#267009
Ionia Maximum Correctional Facility
1576 W. Bluewater Highway
Ionia, MI 48846

Mr. Derrick Lee Cardello-Smith
#267009

Ionia Maximum Correctional Facility
1576 W. Bluewater Highway
Ionia, MI 48846

Mailed 5-15-25
Case No 5:24-12647

GRAND RAPIDS MI
16 MAY 2025PM 6
FIRST CLASS

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U.S. DISTRICT COURT

Office of the Clerk
United States District Court
Theodore Levin US Courthouse
231 W. Lafayette Blvd-Room 564
Detroit, MI 48226

48226-271833

